

Data Privacy and Protection Policy

Date: 01/11/2021

Policy

This Data Privacy & Protection Policy applies to Signifo Ltd applications and platform (collectively, the “Services”), gb.webexpenses.com/we/ and other interactions (e.g., customer service inquiries, user conferences, etc.) you may have with Signifo Ltd.

For privacy policy regarding our marketing site please refer to:

<https://www.webexpenses.com/gb/privacy-policy/>

This Data Privacy & Protection Policy does not apply to any third-party applications or software that integrate with the Services through the Signifo Ltd platform (“Third Party Services”), or any other third party products, services or businesses. In addition, a separate agreement governs the delivery, access, and use of the Services (the “Managed Service Agreement”).

Information we collect and receive

First Name (Mandatory)

Surname (Mandatory)

Email Address (Mandatory)

Sort Code (Optional)

Account Number (Optional)

Roll Number (Optional)

Mobile Number (Optional)

Credit Card Number (Optional and encrypted at the point of entry)

Vehicle Type, Registration Number, Make, Model, Engine Type and Engine Capacity (Optional)

Log data

Our servers automatically collect information when you use or access Webexpenses. This is common practice in most services delivered over the internet. Log data may include the Internet Protocol (IP) address, the date and time the services were used, and browser details.

Location data

If opted in by the customer we use an IP Geolocation database to power a Geolocation widget that shows the administrators and account users a visualisation of the claimant's location at the point of claim creation.

How we get information and why we have it

Most of the personal information we process is provided to us directly by the customer that is using Webexpenses for one of the following reasons:

- The creation of user accounts and system setup in Webexpenses to enable the recording and reconciliation of expense claims in relation to personal and credit card spend.

We may also receive personal information directly from end users of Webexpenses, from the following scenarios:

- End users adding personal data into claim items.

How we use information

We use the information that you have given us to allow for the processing, reimbursement and reconciliation of expense claims. Signifo Ltd is the processor of Customer Data and the Customer is the controller. Customers may, for example, use the Services to grant and remove access to the application, assign user roles and configure settings, access, modify, export, share and remove customer data.

Signifo Ltd uses other information in furtherance of our legitimate interests in operating our Services, Websites and business. More specifically Signifo Ltd uses other information:

- To provide, update, maintain and protect our Services, Websites and business. This includes use of other information to support delivery of the Services under a managed Service Agreement, prevent

or address service errors, security or technical issues and analyse and monitor usage, trends and other activities at an authorised User's request.

- To communicate with you by responding to your requests, comments and questions. If you contact us, we may use your other Information to respond.
- To send emails and other communications. We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices, such as security and fraud notices. In addition, we sometimes send emails about new product features, promotional communications or other news. These are marketing messages so you can control whether you receive them.
- For billing, account management, and other administrative matters. Signifo Ltd may need to contact you for invoicing, account management reasons. We use account data to administer accounts and keep track of billing and payments.
- To investigate and help prevent security issues and abuse.

Data retention

Due to the financial nature of the data processed by Webexpenses, we do not have a set retention period. Instead, we will keep data until deletion has been requested by the Customer or until the end of the contract between Webexpenses and the Customer (we will confirm transfer of any Webexpenses data to the customer before this deletion takes place).

How we share and disclose information

This section describes how Signifo Ltd may share and disclose Information.

Customer's Instructions

Signifo Ltd will solely share and disclose Customer Data in accordance with a Customer's instructions, including any applicable terms in the Managed Service Agreement, and in compliance with applicable law and legal process.

Customer access

Owners, administrators and authorised users may be able to access, modify or restrict access to Customer Information. For example, this may include an Administrator user adding an email address into Webexpenses which is made visible to other Administrator users within the Customers account.

Third-party service providers and partners

We may engage third-party companies or individuals as service providers or business partners to process Other Information and support our business. These third parties may, for example, provide virtual computing and storage services. Additional information about the subprocessors we use to support the delivery of our Services is set forth within the section "Subprocessors".

Security

Signifo Ltd takes the security of data very seriously. We take all reasonable steps to ensure that all Customer Data and Other Information is secure and protected from misuse, loss and unauthorised access and modification. To learn more about current practices and policies regarding security and confidentiality of the Webexpenses application, please refer to our Assured Compute Platform document. If required, please contact your account manager for a copy.

Lawful basis for processing

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- We have a contractual obligation.
- We have a legitimate interest.

Data protection officer

To communicate with our Data Protection Officer please email data.protection@webexpenses.com.

Subprocessors

Signifo Ltd uses certain subprocessors to assist in providing its Services. It works with service providers that have or may have access to or process Signifo Ltd customer data. Before engaging any sub-processors, Signifo Ltd performs strict due diligence to ensure our customer data remains secure and protected, including ensuring our subprocessors satisfy equivalent contractual obligations as those required from Signifo Ltd as a Processor. The list of subprocessors used by Signifo Ltd is published on our public website at <https://terms.webexpenses.com/global/subprocessors.pdf>

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

As Webexpenses data is in relation to company financials this will be considered on a case-by-case basis and we may require verification from the individuals themselves and from the members of the company for which they are employed before we can enact some of the above.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at data.protection@webexpenses.com

Contact details

Signifo Limited,
Number 3 Des Roches Square,
Witan Way, Witney,
OX28 4BE

+44 (0)800 711 7136
data.protection@webexpenses.com
www.webexpenses.com